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IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEVADA

U.S. BANKRUPTCY COURT  
DANIEL S. OWENS, CLERK

In re:  
META MATERIALS INC.,  
Debtor. Case No. 24-50792-hlb

**NOTICE OF NON-PARTY MATTHEW J. PEASE AND MOTION TO STRIKE  
SCANDALOUS MATERIAL**

Matthew J. Pease, a non-party to this proceeding, respectfully moves this Court to strike from Document 1878 the scandalous, false, and defamatory references to him made by Attorney James W. Christian. In support of this Motion, Mr. Pease states as follows:

1. Mr. Pease is a private citizen and a shareholder of Meta Materials Inc. He previously submitted a limited filing in this bankruptcy case solely disclosing his ownership of a very small number of shares. Mr. Pease made no allegations, objections, or accusations in this proceeding against Meta Materials, Next Bridge Hydrocarbons, James W. Christian, or any other parties.
2. Despite Mr. Pease's complete non-involvement in any objections or complaints before this Court, Document 1878 falsely and recklessly identifies him as participating in an alleged effort to "obstruct, impair, and derail" legal proceedings. There is no factual basis for these defamatory accusations.
3. The inclusion of Mr. Pease's name and the defamatory statements about him are immaterial, scandalous, and serve no legitimate purpose in this bankruptcy case. Such reckless allegations not only harm Mr. Pease personally and professionally but also undermine the dignity and integrity of these proceedings.

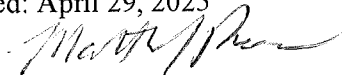
4. Pursuant to Federal Rule of Bankruptcy Procedure 7012 and Federal Rule of Civil Procedure 12(f), scandalous or impertinent material may be stricken from the record. The false and reckless accusations against Mr. Pease are precisely the type of scandalous material that warrants striking.

WHEREFORE, Matthew J. Pease respectfully requests that this Court:

- a) Strike all references to Mr. Pease contained in Document 1878;
- b) Admonish Attorney James W. Christian for filing reckless and defamatory accusations against a non-party; and
- c) Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: April 29, 2025



/s/ Matthew J. Pease  
Matthew J. Pease  
1 Cobbler Lane  
Amherst, NH 03031

**EXHIBIT A**

**DECLARATION OF MATTHEW J. PEASE IN SUPPORT OF MOTION TO STRIKE**

I, Matthew J. Pease, declare under penalty of perjury under the laws of the United States as follows:

1. I am a private citizen residing in Amherst, New Hampshire. I am over the age of 18 and competent to testify to the matters stated herein.
2. I am a shareholder of Meta Materials Inc. and, many months ago, I submitted a filing to this Court solely to disclose my ownership of a very small number of shares. I made no allegations, objections, or accusations in this bankruptcy proceeding against Meta Materials, Next Bridge Hydrocarbons, James W. Christian, or any other parties.
3. On or about April 23, 2025, I became aware that Attorney James W. Christian filed Document 1878 in this case, in which he falsely and recklessly identified me as participating in a supposed broader effort to "obstruct, impair, and derail" legal proceedings, despite the fact that I had no involvement whatsoever in any such activities.
4. Mr. Christian's reckless inclusion of my name, without any evidentiary basis or justification, represents a shocking abandonment of the standards of professionalism, honesty, and factual rigor expected of attorneys admitted to practice before this Court. His baseless accusations against an uninvolved shareholder are not merely inappropriate—they are disgraceful.
5. I have never authorized anyone to act on my behalf in this proceeding. I have taken no actions, directly or indirectly, to obstruct, impair, or derail any legal matter before this Court or elsewhere. Mr. Christian's defamatory allegations are pure fiction, apparently

invented as a tactic to deflect scrutiny from his own conflicts and misconduct. I took no part in preparing or submitting any such complaint, nor did I coordinate with anyone in connection with it.

6. Christian's misconduct has inflicted reputational harm upon me, exposing me to public suspicion, ridicule, and emotional distress. His filing, now a matter of public record, has falsely branded me as a participant in criminal-like activities without even the pretense of evidence.
7. Notably, Mr. Christian is presently a defendant in pending litigation alleging serious misconduct and defamation (Christian v. Traudt, Case No. DC-24-02379, District Court of Dallas County, Texas). His repeated resort to baseless personal attacks and defamatory accusations demonstrates a deeply troubling pattern of unethical conduct.
8. Mr. Christian's behavior in this case not only harms me personally but insults the dignity of this Court and undermines the very integrity of these proceedings. If officers of the Court are permitted to lash out against innocent non-parties with reckless falsehoods whenever their own behavior is questioned, public trust in the judiciary will inevitably erode.
9. As a result of Mr. Christian's egregious and defamatory conduct, I am actively evaluating further legal remedies, including but not limited to claims for defamation, abuse of process, and other appropriate relief.
10. I respectfully urge this Court to strike all references to me from Document 1878, to admonish Mr. Christian for his reckless and unethical behavior, and to take notice of the seriousness of an attorney's public falsehoods against an uninvolved citizen.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of April, 2025.

A handwritten signature in cursive script, appearing to read "Matthew J. Pease".

/s/ Matthew J. Pease

Matthew J. Pease

1 Cobbler Lane

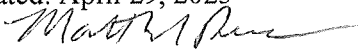
Amherst, NH 03031

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, I served a true and correct copy of the foregoing Notice of Non-Party Matthew J. Pease and Motion to Strike Scandalous Material, including the Declaration of Matthew J. Pease, by email upon the following:

James W. Christian  
Christian Attar  
1177 West Loop South, Suite 1700  
Houston, TX 77027  
Email: jchristian@christianattarlaw.com

Dated: April 29, 2025

  
/s/ Matthew J. Pease  
Matthew J. Pease